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April 9, 2020

VIA ECF

The Honorable Margo K. Brodie  
United States District Court  
for the Eastern District of New York  
225 Cadman Plaza East  
Courtroom 6F  
Brooklyn, NY 11201

Re: *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*,  
No. 1:05-MD-1720 (MKB)(JO)

Dear Judge Brodie:

We write regarding Rule 23(b)(3) class member Paulina Guzman's request to rescind her opt-out, which appears to have been made in error related to a language issue. Ms. Guzman originally sent her opt-out on July 15, 2019. Epiq sent Ms. Guzman a letter explaining that her opt-out was defective, although timely. Ms. Guzman replied to Epiq on September 24, 2019, but did not correct the deficiency. Then on February 24, 2020, Epiq received another letter from Ms. Guzman requesting that she be allowed to opt back in to the class.

Ms. Guzman's opt-out request was included on the Class Administrator's Report of Exclusion Requests as timely and incomplete because no TIN was provided.

Rule 23(b)(3) Class Counsel believe that Ms. Guzman's request to be excluded should be rescinded because it appears the merchant was confused and did not intend to opt-out of the settlement. In addition, if Ms. Guzman is permitted to rejoin the class, the claim is likely to be very small. We therefore respectfully request that the Court permit Ms. Guzman to rejoin the class. The correspondence between the class member and Epiq can be provided, with redactions for sensitive personal information, if requested.

Respectfully submitted,

*/s/ K. Craig Wildfang*  
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Thomas J. Undlin  
**Robins Kaplan LLP**

*/s/ H. Laddie Montague, Jr.*  
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*/s/ Alexandra S. Bernay*  
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cc: Counsel of Record via ECF